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David L. Meier
Director
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JUL 8 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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July 8, 1996

Mr. William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D. C. 20554

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RE: **Oral Ex Parte Presentation**

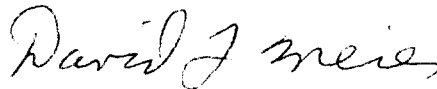
CC Docket No. 96-98, Implementation of the Local Competition Provisions in
the Telecommunications Act of 1996

Dear Mr. Caton:

Earlier today David Meier, Director of Legislative and Regulatory Planning, Steve Kritzer, Director of Regulatory Planning, and Patricia Rupich, Regulatory Analyst, met with Richard Welch, Chief of the Policy and Planning Division of the Common Carrier Bureau to discuss various issues relating to interconnection concerns on mid-size LECs in the above-referenced proceeding including access charges, 2% suspension and modifications, bona fide requests, and technical feasibility.

The original and one copy of this Notice are being submitted in accordance with Section 1.1206(a)(2) of the Commission's Rules. Please date stamp this copy as acknowledgment of its receipt. Questions regarding this Notice may be directed to Ms. Amy Collins at (513) 397-1333.

Sincerely,



David L. Meier

cc: Richard Welch

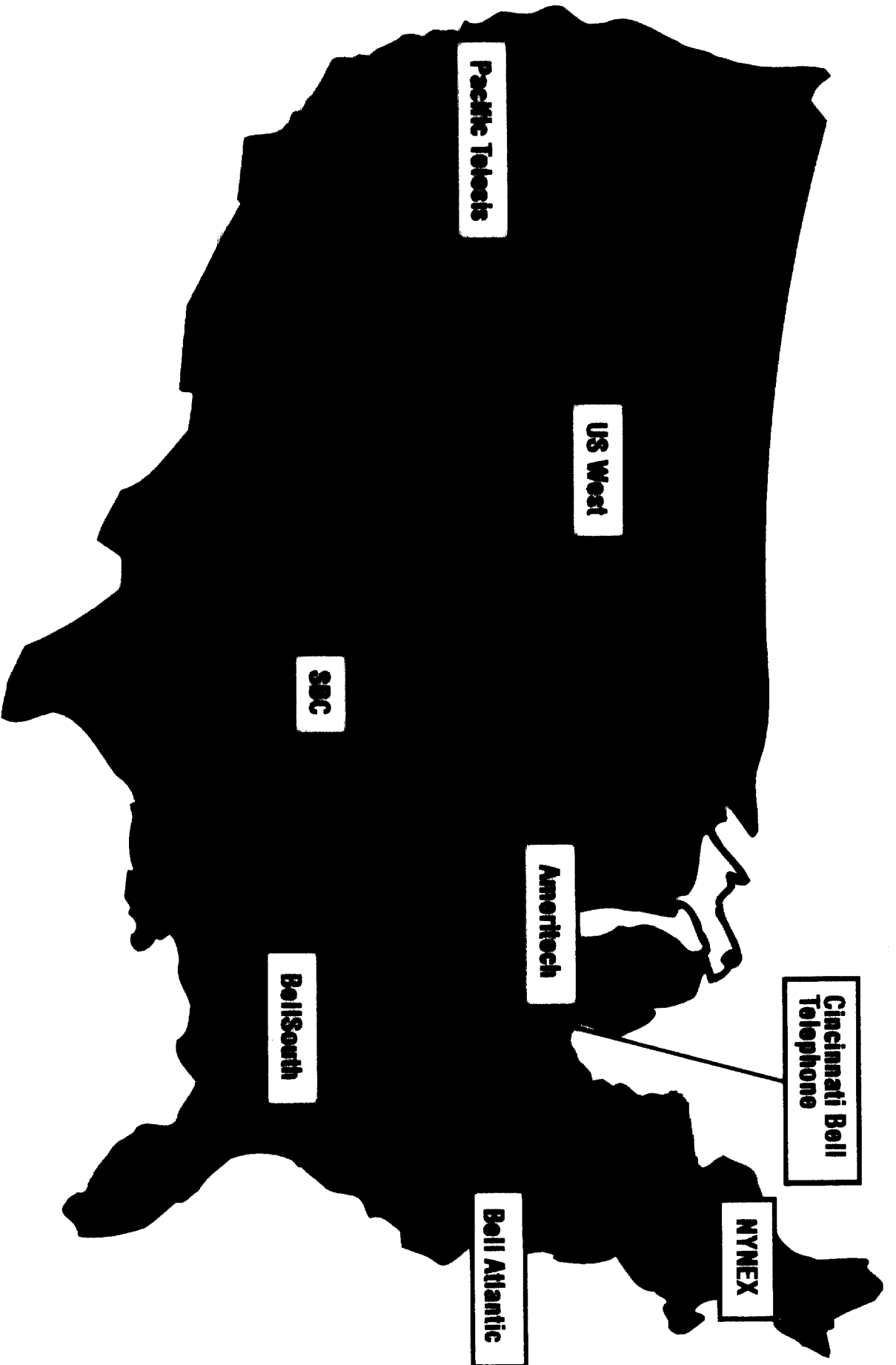
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**CINCINNATI BELL EX PARTE
CC DOCKET NO. 96-98**

- **Small and Mid-Size Companies Must Not be Placed at Risk**
 - Congress recognized that small and mid-size companies do not have the size, financial ability, resources and economies of scope and scale of the large LECs.
 - To ensure that customers of small and mid-size LECs are not adversely affected during the transition to competition, the competitive rules must not place small and mid-size LECs at risk.
- **Section 251(f)(2) Suspensions and Modifications**
 - Applies to all companies with less than 2% of the nation's access lines.
 - Designed to help small and mid-size companies transition to competition.
 - If a company shows that a requirement would have an adverse economic impact on consumers, is economically burdensome, or technically infeasible, it has sufficiently proved that the requirement is not in the public interest and the suspension or modification must be granted.
- **Bona Fide Requests**
 - Requests for interconnection must be bona fide.
 - Requestors should be required to include a commitment to order the items requested in the quantities requested or to pay the LEC's costs of processing the request.
 - The rules should allow LECs to recover their costs of processing the request through application fees, deposits or performance bonds.
- **Technical Feasibility**
 - Technical feasibility must consider the financial impact on small and mid-size LECs and their customers.
- **Access Charges**
 - IXC's should not be able to combine unbundled elements to bypass access.
- **Existing Interconnection Agreements**
 - Existing interconnection agreements between non-competing LECs should not be available to competing LECs.
 - Such agreements are not reflective of the competitive circumstances between LECs and new entrants.

July 8, 1996



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NYNEX

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BellSouth

Excerpts from:

Case No. 95-845-TP-COI before the Public Utilities Commission of Ohio, Finding and Order issued June 2, 1996

Appendix A, Section III. (page 16)

C. Bona Fide Request For Interconnection

A bona fide request for interconnection shall be in writing and shall detail the specifics of the request. A bona fide request for interconnection submitted by any telecommunications carrier, pursuant to Section 251 of the 1996 Act, shall include, at a minimum, the following, as applicable:

1. The technical description of the requested meet point(s) or, in the alternative, the requested point(s) of collocation (e.g., the end office, tandem, etc.);
2. For each collocation point: a forecast of DS-1 and DS-3 cross connects required during the term of the agreement; the requested interface format (electrical vs. optical); the type of collocation (physical or virtual) requested; and, if physical collocation is requested, the amount of partitioned space required, as well as DC power and environmental requirements;
3. For each meet point, a detailed technical description of the requested interface equipment must be provided;
4. The requested reciprocal compensation arrangement for transport and termination of local traffic;
5. A technical description of any required unbundled network elements;
6. Any requested access to the poles, ducts, conduits, and rights-of-way owned or controlled by the providing carrier;
7. Any requested white pages directory listings for the customer of the requesting carrier's telephone exchange service;
8. Any requested access to 9-1-1, E-9-1-1, directory assistance, operator call completion service, and any required dialing parity capability;

Excerpts from:

Case No. 95-845-TP-COI before the Public Utilities Commission of Ohio, Finding and Order issued June 2, 1996

9. Any requested telephone numbers for the assignment to the requesting LEC's local exchange service customers;
10. The requested method(s) of interim number portability capability, until long-term number portability is available;
11. An itemized list of the required telecommunications services to be offered for resale by the providing carrier, and required operational support systems associated with the resale of these telecommunications services;
12. If transit traffic functionality is required, the requested method(s) of providing functionality at each requested point of interconnection pursuant to Section IV of these guidelines;
13. The requested completion date; and
14. A list including names, phone numbers, and areas of responsibility of the requesting carrier's contact persons for the negotiation process.

An application fee may be charged by the providing carrier to recover no more than the reasonable cash outlays expended in the course of fulfilling the bona fide request. The amount of the application fee shall be subject to the Commission's review and approval, and shall be assessed only after the Commission has approved an interconnection arrangement or the requesting carrier has decided to no longer pursue the arrangement. Disputes concerning the amount of the fee will be resolved by the Commission through the arbitration process.

The following systems and office procedures will require modification in order to comply with wholesale/resale type of service offering:

1. Service negotiation
 - a. SOE - Standard Operating Environment
 - b. OS/ORDER - Service Order Entry System
 - c. COCRIS - Cincinnati On-Line Customer Records Information System
 - d. EXACT
 - e. ACD
 - f. CARE
 - g. SAG
2. Provisioning Process
 - a. OS/PLANT - Outside Plant Inventory and Assignment
 - b. OS/CONNECTOR - Interface with COSMOS and MARCH Systems
 - c. TIRKS - Trunks Integrated Record Keeping System
 - d. TIRKS Interface - Interface between OS/ORDER and TIRKS
3. Billing Systems
 - a. MPS - Message Processing System
 - b. CBTJ - Cash, Billing, Treatment, and Journals
 - c. CRIS - Customer Records Information System
 - d. Rate Table modifications
 - e. CABS - Carrier Access Billing System
4. Dispatch and Repair
 - a. LMOS - Loop Maintenance Operations System
 - b. AVA - Automatic Voice Answer
 - c. NAVIGATE - Dispatch System
 - d. FAS - Force Access System
 - e. SSAIMS - Special Service Administration, Installation and Maintenance System
5. Ancillary Services
 - a. LSS
 - b. DDA
 - c. E911
6. Accounting
 - a. Dollar
 - b. BDUCTS
 - c. LCOP
7. Other
 - a. TN Assignment and other pre-service ordering functions
 - b. EDI/Electronic Bonding information exchange
 - c. Order & Service completion status
 - d. Reports comparing CBT installation and maintenance performance statistics for CBT customers and CLECs

Excerpts from:

Case No. 95-845-TP-COI before the Public Utilities Commission of Ohio, Finding and Order issued June 2, 1996

Appendix A, Section III.D.2. (page 20)

g. Nondiscrimination Provision

A LEC shall make available any interconnection, service, or network element provided under an agreement approved pursuant to this section and to Section 252 of the 1996 Act to which it is a party, to any other requesting telecommunications carrier upon the same terms and conditions as those provided in the agreement. Existing EAS compensation arrangements for the transport and termination of traffic shall be maintained until the Commission determines otherwise, since such arrangements are not approved by the Commission pursuant to Section 252 of the 1996 Act **and shall only be available to other similarly situated LECs establishing an arrangement with a non-competing LEC.** [Emphasis added.] This provision does [sic] not prohibit the Commission from imposing bill and keep compensation through arbitration if deemed warranted by the Commission.